## REMARKS

Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50, and 82-97 are pending in the application. Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50 and 82-97 are rejected under 35 U.S.C. 102(e) as being anticipated by U.S. Patent Application Publication US 2002/0026394 to Savage, et al. It is respectfully submitted that the combination of features of the claims as currently pending in the application are not taught or suggested by the cited reference. Therefore, reconsideration of the rejection of the claims, and allowance of the claims over the cited reference, is respectfully requested, for the following reasons.

It is first respectfully noted that a claim is anticipated under 35 U.S.C. §102(e) only if each and every element that is set forth in the claim is found, either expressly or inherently described, in the cited prior art reference. The identical invention must be shown in the cited reference in as complete detail as is contained in the claim. (See MPEP 2131.)

Pending independent claim 82 is drawn to a bill presentment and payment system adapted to receive billing data from a plurality of billers in a plurality of different billing data forms, in which a parsing functionality is used to transform such billing data in different forms into a common document model wherein all of the billing data has the same form, wherein the transformed billing data is stored in a database and such transformed billing data is retrieved from the database to be output to bill payers, and in which the plurality of billers are allowed to retrieve, review, and alter the transformed

billing data in the database. New independent claim 88 is a method claim corresponding to new apparatus claim 82.

In the following remarks, Applicants will show that the present invention provides an adaptive and dynamic common document model for electronic bill presentment and payment in which a biller may maintain control over the biller's billing data after the data has been transformed from the format in which it was provided by the biller into a common document format

Briefly, the present invention provides an electronic bill presentment and payment (EBPP) system which provides a common document model, allowing a plurality of billers to interface with the system of the present invention to cooperatively present and accept payment of bills. The present invention parses the biller's data stream into a common document model. The transformed data are stored in the database. The use of the common format document model and the universality of its structure allows the plurality of billers using the present invention to maintain control, from a biller interactivity functionality, over their billing data and how it is presented on any desired platform using any desired applications, formats and protocols. In other words, the present invention can accommodate individual data sets from, for example, both a first and second biller without mandating a particular template (for the billers to follow) for both billers. Essentially, Applicants' common model document processing functionality provides for a generic conversion process that is not confined to a particular industry, biller, or type of customer. Thus, the present invention provides for dynamic structural

processing and conversion of a plurality of bill data types.

Savage, et al describes a computer based system and method for combined billing for a customer on a plurality of customer accounts. For example, credit card bills, utility bills, etc. may be combined in a single statement that is presented to a customer. A detailed presentation of the methods taught in Savage, et al is presented in Figs. 22 and 23 and paragraphs [0104]-[0110] thereof. As taught herein, a vendor (biller) creates and sends a flat file of vendor line items to a bill aggregator. The aggregator receives the files, verifies formatting of the line item, returns invalid items, and performs various checks and calculations on the data received. (Fig. 21.) The data from the bill aggregator is used to render and deliver a bill to a customer, by paper invoice, electronic (web based) invoice, etc., for those customers who have requested a combined bill.

Although Savage, et al. describes and suggests combining bills from various different billers into a combined billing statement, it is respectfully submitted that this reference does not describe in any detail how data presented in different form from different billers is to be handled. Independent Claims 82 and 88 of the present application feature in input processing functionality for and step of receiving billing data from a plurality of billers in a plurality of different billing data forms. In contrast, the system and method of Savage, et al. appears to require that all billing data be received in the same flat file line item charge format. For example, Savage, et al. specifically states that line items received by the bill aggregator are verified for the proper form and

returned if invalid. (See paragraph [0104] of Savage, et al.)

Independent Claims 82 and 88 of the present application further feature specific functionalities for and steps of handling billing data received in a plurality of billers in a plurality of different billing data forms, including parsing the data to transform the billing data into a common document model. It is respectfully submitted that Savage, et al. does not describe or suggest such a transforming feature, since the system and method described in Savage, et al requires that all data be received in a pre-established flat file line item format.

Independent Claims 82 and 88 of the present application also feature a system and method wherein a biller is able to retrieve and review data after it has been received and transformed. It is respectfully submitted that this feature is not described or suggested by the cited reference. Nothing in Savage, et al. describes or suggests that billers have the ability to retrieve and review data after it has been delivered to the bill aggregator described therein.

Thus, it is respectfully submitted that the cited reference does not describe or suggest receiving billing data from a plurality of billers in a plurality of different billing data forms, and thus does not describe or suggest parsing such data into a common document model wherein the transformed billing data is all of the same form. It is also respectfully submitted that the cited reference and does not describe or suggest allowing a biller the ability to retrieve and review such transformed billing data. Each of these features is an element of pending independent Claims 82 and 88 of the present application. Therefore, it is respectfully submitted that these independent claims, as well as

the claims that depend therefrom, are not anticipated by the cited reference, and are in condition for allowance, for the foregoing reasons.

The dependent claims pending in the present invention include additional features that further distinguish these claims from the cited references.

Dependent claims 85 and 91, which depend, indirectly, from independent claims 82 and 88, respectively, feature parsing the billing data received from a plurality of different billers in a plurality of different forms using a rules of conversion defined using a uniform rules definition language. (See, e.g., the application specification at pages 26 and 27.) It is respectfully submitted that Savage, et al does not describe or suggest a rules based process defined using a uniform rules definition process to parse biller billing data in a plurality of different forms.

As discussed above, Savage, et al. does not teach or suggest receiving data in a plurality of different billing data forms, and thus does not describe or suggest the parsing functionality, and thus does not teach or suggest rules of conversion defined using a uniform rules definition language.

Dependent Claim 95 further distinguishes over Savage, et al. by reciting a biller interactivity functionality coupled to the database adapted to allow the plurality of billers to identify market segments of said bill payers according to market rules and information retrieved from said database. There is no mention of the billers being able to identify market segments of bill payers in the Savage, et al. Rather, Savage, et al. suggests that retrieving marketing

information from a database of billing data may be a service that is provided by the financial institution acting as the bill aggregator. Savage, et al. does not describe or suggest that the billers may have access to such data. Thus, it is respectfully submitted that claim 95 and the claims that depend therefrom are allowable over the cited references for this additional reason.

No evidence is provided for the anticipation, teaching, or suggestion of a modularized input processing engine, as recited in dependent Claim 97. The advantage of using a modularized processing engine is that this facilitates scalability and expandability. For example, if a new form of biller data is encountered or must be dealt with for transformation into a form and format, the modularized input processing engine of Claim 97 allows for the processing of the new biller data in a modular way (see Applicants' Specification, page 25, lines 17-19). There may be separate engines for each new form of data so that the output of each preprocessing engine is ready for processing by a rule-based parsing engine. In other words, because the preprocessing of biller data is modularized, a new input processing engine can easily be integrated to handle new data types. Therefore, Claim 97 is believed to be patentable for the additional reasons provided.

In summary, Claims 2-10, 13, 17, 22-30, 32-34, 39, 41-43, 50, and 82-97 are believed to be allowable for the reasons given herein. Accordingly, these claims remain pending following entry of this Amendment, and are in condition for allowance at this time. As such, Applicants respectfully requests reconsideration of the application, with an early and favorable decision being

solicited. Should the Examiner believe that the prosecution of the application could be expedited, the Examiner is requested to call Applicants' undersigned representative at the number listed below.

Respectfully submitted,
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